

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

AARON SIEGEL;

JASON COOK;

JOSEPH DELUCA;

NICOLE CUOZZO;

TIMOTHY VARGA;

CHRISTOPHER STAMOS;

KIM HENRY; *and*

ASSOCIATION OF NEW JERSEY  
RIFLE & PISTOL CLUBS, INC.,

*Plaintiffs,*

v.

MATTHEW PLATKIN, in his official  
capacity as Attorney General of New  
Jersey,

PATRICK J. CALLAHAN, in his  
official capacity as Superintendent of the  
New Jersey Division of State Police,

*Defendants.*

Civil Action No. 1:22-cv-07463-  
KMW-AMD

**CIVIL ACTION**

**(ELECTRONICALLY FILED)**

**DECLARATION OF TIMOTHY VARGA IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

1. I, Timothy Varga, am a plaintiff in the above-titled action. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and I am competent to testify to the matters stated below.

2. I am a law-abiding resident and citizen of the United States and the State of New Jersey. I reside at 1800 Clinton Ave., Wall Township, New Jersey 07719. I am a member of Association of New Jersey Rifle & Pistol Clubs, Inc.

3. I am a Deacon of the Grace Bible Church in Wall Township, New Jersey and a member of the church's security team.

4. I am a firearm owner, and I applied for a Handgun Carry Permit holder because I believe that possession and carry of firearms is an important aspect of protecting my family and my church from the risk of violent crime. I am also an accomplished competitive shooter.

5. I applied for my Handgun Carry Permit because I recognize that violent crime can take place anywhere, including when I am outside the home, and including at the church.

6. By letter dated December 19, 2022 the Honorable Lisa P. Thorton, A.J.S.C. forwarded my approved Handgun Carry Permit to my police department, instructing the Chief of Police to prepare the permit for me to pick up.

8. Accordingly, I expect to have my Handgun Carry Permit in hand imminently.

9. I am aware of numerous mass shooting incidents which took place at houses of worship around the United States, including the First Baptist Church in Sutherland Springs, Texas, the Emanuel African Methodist Episcopal Church in Charleston, South Carolina, and the Tree of Life Synagogue in Pittsburgh, Pennsylvania.

10. In particular, however, I am aware of the Freeway Church of Christ in Texas where, in 2019, a volunteer parishioner armed with a concealed handgun successfully ended an attack by an active shooter within six seconds after it began.

11. I welcomed the *Bruen* decision because the church's campus cannot reasonably be protected with paid security. The campus consists of 14 acres of land with three buildings (church sanctuary, school building, and gymnasium) totaling 47,000 square feet.

12. The school building and gymnasium building are leased to the Ambassador Christian Academy.

13. The church holds formal prayer services in the sanctuary building on Sundays and Wednesdays with less formal prayer meetings all week.

14. Several days during the week the church also holds bible study groups for adults and children of all ages.

15. Throughout the year the church holds sports leagues and clinics, as well as special seasonal or holiday events with hundreds or in some instances several thousand attendees.

16. Overall, the church is very busy with events most days of the year.

17. The church's meager security budget barely covers a handful of such events, and even those are inadequately manned. Further, the funds used for the bare bones security budget could instead be used for desperately needed additional administrative staff, clergy, technology staff, capital improvements, facilities upkeep, and additional ministry work.

18. There are members of the church who already received their permits. I and other members of the clergy, the diaconate, and the congregation who either have or are applying and qualify for Handgun Carry Permits would carry our handguns to protect the people attending church; however, we refrain from doing so for fear of arrest and prosecution.

18. I refrain from carrying in any part of the church sanctuary or church campus because of the prohibition on carry at a "school, college, university or other educational institution" set forth in A4769 section 7(a)(7).and N.J.S. 2C:39-5(e) because those prohibitions include any part of the buildings, grounds, or parking area. Therefore, I fear that the prohibition on carry at "school, college, university or

other educational institution” also includes the entire church campus and all of the buildings, not merely the two buildings leased by Ambassador Christian Academy.

19. I also refrain from carrying my handgun at the church because of the prohibition on carry at a “school, college, university or other educational institution” set forth in A4769 section 7(a)(7) because I am unsure if the various adult and children’s bible study classes qualify as a “school, college, university or other educational institution” within the meaning of those sections because those terms are vague and A4769 does not define those terms.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed within the United States.

  
\_\_\_\_\_  
Timothy Varga

12/23/2022  
\_\_\_\_\_  
Date